



United States  
Department of  
Agriculture

Grain Inspection,  
Packers and Stockyards  
Administration

Stop 3630  
1400 Independence Ave., SW  
Washington, DC 20250-3630

February 10, 2012

Reference # 244

TO: FGIS POLICY BULLETIN BOARD

FROM: Robert Lijewski, Director  
Field Management Division

SUBJECT: Mycotoxin Reinspection Options for Unit Trains

ORIGINATING OFFICE: Policies, Procedures, and Market Analysis Branch

### 1. PURPOSE

This memorandum clarifies GIPSA's policy on disposition options for unit train composites and sublots exceeding contractual limits for mycotoxins (e.g., aflatoxin, vomitoxin).

### 2. BACKGROUND

Under FGIS instructions for unit train loading, an applicant can choose to have each car graded as an **individual lot**, load the unit train using the **CuSum plan**, use **composite** sample analysis, or use **average composite** analysis to achieve the desired quality. Combined lot procedures can be used to further combine multiple carriers on a single certificate. If the applicant requests multiple railcars on a single certificate, the applicant has several options for certification. These options also apply to mycotoxin testing, which was not specifically addressed in previous instructions.

### 3. POLICY

This policy applies to situations where an applicant elects to load a unit train using options outlined in Policy Bulletin Reference #238 (using CuSum plan, composite sample analysis, or average composite analysis) and encounters an unacceptable mycotoxin result. If a subplot or composite exceeds the contract limits for a mycotoxin, the applicant may either request a reinspection or remove the out-of-tolerance grain from the lot. Mycotoxin reinspections on unit train subplot or composite material portions are based on the file sample of the subplot/composite sample.

If the applicant elects to remove the material portion subplot or off-grade composite from the unit train lot, the composite/sublot railcars will become eligible to be sampled and graded individually, or as a new lot, including using a different scope than by which it was originally loaded. For example: an applicant is loading a 75-car unit train of U.S. No. 2 O/B Yellow Corn on a diverter type mechanical sampler using average composite procedures, and 5-car composites on aflatoxin (max 20 ppb), and midway through the train, an aflatoxin composite exceeds 20 ppb. The applicant may remove that composite from the unit train and request a new sample to be taken from the 5-cars on the basis of a probe sample. **Please see the attached Questions and Answers for further information.**

#### **4. FILING INSTRUCTIONS**

File a copy of this memo with the Grain Inspection Handbook, Book III, Chapter 1, Inspection of Unit Trains, Shiplots, and Lash Barges, until the handbook is revised to include this change. Field office managers please ensure that a copy of this memorandum is provided to official agencies operating within their circuit.

#### **5. QUESTIONS**

Direct any questions concerning this policy to Pat McCluskey, Policies, Procedures, and Market Analysis Branch (PPMAB), at (816) 659-8403, or email at [Patrick.J.McCluskey@usda.gov](mailto:Patrick.J.McCluskey@usda.gov), or Tony Goodeman at (202) 720-0291, or email at [Anthony.T.Goodeman@usda.gov](mailto:Anthony.T.Goodeman@usda.gov).